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10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee for New*

11 *Century Home Equity Loan Trust 2005-2*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST  
15 COMPANY, AS INDENTURE TRUSTEE  
16 FOR NEW CENTURY HOME EQUITY  
17 LOAN TRUST 2005-2,

18 Plaintiffs,

19 vs.

20 SUZANNAH R NOONAN IRA, LLC, a  
21 Nevada limited liability company; JAMES M.  
22 ALLRED IRA, LLC, a Nevada limited liability  
23 company;

24 Defendants.

Case No.: 2:16-cv-02883-KJD-CWH

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSE TO MOTION TO DISMISS  
COMPLAINT**

**(First Request)**

25 Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee for New Century  
26 Home Equity Loan Trust 2005-2 (“Deutsche Bank”), and Defendants, Suzannah R. Noonan IRA,  
27 LLC (“Noonan”) and James M. Allred IRA, LLC (“Allred”) (collectively the “Parties”), by and  
28 through their counsel of record, hereby stipulate and agree as follows:

On December 13, 2016, Deutsche Bank filed its Complaint which named Noonan and Allred as defendants [ECF No. 1]. On February 13, 2018, Noonan and Allred filed their Motion to Dismiss Deutsche Bank’s Complaint [ECF No. 22]. Presently, the deadline for Deutsche Bank to respond to the Motion to Dismiss is February 27, 2018.

The Parties have discussed extending the deadline for Deutsche Bank to file its response

1 to March 20, 2018.

2 This is the first stipulation for extension of time for Deutsche Bank to respond to Noonan  
3 and Allred's Motion to Dismiss. The extension is requested in good faith and is not for purposes  
4 of delay or prejudice to any other party.

5 WHEREFORE, based on the foregoing, IT IS HEREBY STIPULATED AND AGREED  
6 that the deadline for Deutsche Bank to file its response to the Motion to Dismiss shall be  
7 extended to March 20, 2018.

8 DATED this 23<sup>rd</sup> day of February, 2018.  
9 WRIGHT, FINLAY & ZAK, LLP

DATED this 23<sup>rd</sup> day of February, 2018.  
THE LAW OFFICE OF MICHAEL  
BEEDE, PLLC

10 /s/ Michael S. Kelley

/s/ James W. Fox

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*Noonan IRA LLC, and James M. Allred*  
*IRA LLC*

18  
19 **IT IS SO ORDERED.**

20 DATED February 27, 2018

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24 U.S. MAGISTRATE JUDGE  
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